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Attorneys for Defendant,
Patrick Byrne

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ROBERT HUNTER BIDEN, an
individual,

Plaintiff,

vs.

PATRICK M. BYRNE, an individual,

Defendant.

Case No.: 2:23-cv-09430-SVW-PD
Judge: Honorable Stephen V. Wilson
Courtroom: "10A"

**DEFENDANT PATRICK BYRNE'S
RESPONSE TO PLAINTIFF
ROBERT HUNTER BIDEN'S
FINAL RULE 26 PRETRIAL
DISCLOSURES**

Date: July 28, 2025
Time: 1:30 p.m.
Courtroom: "10A"

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendant Patrick Bryne (“Defendant”) hereby responds to Plaintiff Hunter Biden’s (“Plaintiff”) Final Rule 26 Pretrial Disclosures pursuant to FRCP 26(a)(3)(B).

I. WITNESSES

Pursuant to Defendant’s Notice of Non-Appearance at Trial, Defendant will not testify live, and thus counter designates portions of his testimony in response to Plaintiff’s designation of Defendant’s testimony.

Defendant plans to cross-examine Plaintiff, and will reserve right to recall him to the stand.

Defendant plans to call Mr. Moynihan to testify live.

Defendant has objected to the testimony of SA Smith, and the Court sustained Defendant’s objection to Plaintiff’s Question Number 6.

II. DEPOSITION DESIGNATIONS

Defendant’s counter designations are below in the section title “Defendant Patrick Byrne’s Counter Deposition Designations and Objections to Plaintiff’s Deposition Designations.”

III. DAMAGES

Pursuant to the Court’s pretrial order, Plaintiff is limited to seeking only nominal damages, and punitive damages if the jury finds Defendant liable for defamation per se.

1 Dated: July 25, 2025

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3 By: /s/ Michael C. Murphy, Esq.

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5 Michael C. Murphy, Esq.
6 Michael C. Murphy, Jr., Esq.
7 Attorneys for Defendant,
8 Patrick Byrne
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Defendant Patrick Byrne's Counter Deposition Designations and Objections to Plaintiff's Deposition Designations

Defendant Patrick Byrne hereby offers his counter deposition designations and objections to Plaintiff's deposition designations. For brevity, the below list will only include Plaintiff's deposition designations to which Defendant offers counter designations and/or objections:

<u>Deposition Transcript</u>	<u>Plaintiff's Deposition Designations</u>	<u>Defendant's Counter Deposition Designations and/or Objections</u>
Patrick Byrne Trans. Vol. I	23:17-24	23-4-15
Patrick Byrne Trans. Vol. I	24:18-23	23:25-24:10
Patrick Byrne Trans. Vol. I	35:17-36:10	34:7-35:15; 36:11-19
Patrick Byrne Trans. Vol. I	37:2-25	38:1-39:8
Patrick Byrne Trans. Vol. I	69:8-70:1	69:5-7
Patrick Byrne Trans.	76:14-77:12	77:13-21

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<u>Deposition Transcript</u>	<u>Plaintiff's Deposition Designations</u>	<u>Defendant's Counter Deposition Designations and/or Objections</u>
Vol. I		
Patrick Byrne Trans. Vol. I	84:14-17	Objection: Relevance
Patrick Byrne Trans. Vol. I	87:7-9	Objections: Relevance
Patrick Byrne Trans. Vol. I	93:12-94:16	94:17-23; 95:6-9
Patrick Byrne Trans. Vol. I	179:20-22	179:12-19
Patrick Byrne Trans. Vol. II	268:1-18	268:9-21
Patrick Byrne Trans. Vol. II	271:20-272:6	272:7-8
Patrick Byrne Trans. Vol. II	276:21-277:5	277:6-13
Patrick	313:23-314:5	314:6-9

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<u>Deposition Transcript</u>	<u>Plaintiff's Deposition Designations</u>	<u>Defendant's Counter Deposition Designations and/or Objections</u>
Byrne Trans. Vol. II		
Patrick Byrne Trans. Vol. II	314:18-315:4	315:5-8
Patrick Byrne Trans. Vol. II	447:17-448:5	448:6-10
Patrick Byrne Trans. Vol. II	448:21-449:15	449:16
Patrick Byrne Trans. Vol. III	475:5-7	Objection: Relevance
Patrick Byrne Trans. Vol. III	488:12-489:16	489:17-21
Patrick Byrne Trans. Vol. III	492:4-13	492:14-25
Patrick Byrne Trans. Vol. III	493:1-9	493:10-15

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<u>Deposition Transcript</u>	<u>Plaintiff's Deposition Designations</u>	<u>Defendant's Counter Deposition Designations and/or Objections</u>
Patrick Byrne Trans. Vol. III	512:17-19	5112:20-513:12
Patrick Byrne Trans. Vol. III	526:21-25	527:1-7
Patrick Byrne Trans. Vol. III	544:21-545:9	545:10-546:18
Patrick Byrne Trans. Vol. III	548:14-25	549:1-8
Patrick Byrne Trans. Vol. III	554:4-15	554:16-555:13
Special Agent David Smith Trans.	5:10-6:7	Objections sustained by Court Order: ECF 276, pg. 7-8.

Dated: July 25, 2025

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